

# MEMO ENDORSED AKIN LAW GROUP PLLC

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October 29, 2024

**Via ECF**

The Honorable Victoria Reznik, U.S.M.J.  
United States District Court  
Southern District of New York  
300 Quarropas St.  
White Plains, New York 10601

Re: *Beda, et al., v. The Nurtury at Flandreau, Inc., et al.*  
Case No.: 7:22-cv-04827 (NSR)(VR)

Dear Judge Reznik:

This firm represents Plaintiffs, Jeniffer Beda (“Beda”) and Nicole Garcia (“Garcia”) (collectively, “Plaintiffs”), in the above-referenced putative class and collective action. Defendants are represented by Mitch Rutkin, Esq. (“Mr. Rutkin”) and Jason Wolf, Esq. (“Mr. Wolf”), of Rutkin & Wolf PLLC.

I write to you to request that this Court provide Plaintiffs a three-day extension to file their Second Amended Complaint. Currently the deadline to do so is October 29, 2024; Plaintiffs request that the deadline be briefly adjourned to November 1, 2024. Plaintiffs’ counsel has completed drafting the Second Amended Complaint but is currently waiting for two of the newly joined Plaintiffs to review their factual portions of the Second Amended Complaint and provide counsel with their consent to file.

We thank the Court for its attention to this matter.

Plaintiffs' request is **GRANTED**.

Plaintiffs will file their Second Amended Complaint by no later than **11/1/2024**, but the deadline to serve interrogatories and requests for production of documents remains **11/8/2024**.

The Clerk of Court is kindly directed to close the gavel associated with ECF No. 77.

Respectfully submitted,

**Akin Law Group PLLC**

/s/ Kayla S. Callahan  
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*Attorneys for Plaintiffs*

SO ORDERED.



Hon. Victoria Reznik, U.S.M.J.

Dated: 10/30/2024